IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP Case No. 3:20-cv-00451 RESEARCH INTERNATIONAL, INC.,

Plaintiffs.

Jury Demand v.

BROADCOM INC.: BROCADE COMMUNICATIONS SYSTEMS LLC: AND EXTREME NETWORKS, INC.

Defendants.

SUPPLEMENTAL DECLARATION OF JOHN L. WOOD IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL

I, John L. Wood, declare and attest as follows:

- 1. I am an attorney at the law firm of Egerton, McAfee, Armistead & Davis, P.C., counsel of record for SNMP Research, Inc. and SNMP Research International, Inc. (together, "Plaintiffs") in this action. I am a member in good standing of the State Bar of Tennessee and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called to testify, I could and would testify competently thereto under oath.
 - 2. On January 16, 2021, Plaintiffs sent Defendants a draft protective order.
- 3. Despite repeated requests by me and my co-counsel for Defendants to provide any proposed revisions to the draft order, Defendants did not respond with their initial changes to the protective order until February 27, 2021. In that response, Defendants deleted the entire "Production of Source Code" section in the protective order and replaced it with a comment that states: "Remove for now and negotiate separate agreement regarding source code." A copy of Defendants' revisions to the draft protective order is attached as Exhibit A, and the comment quoted above is at page 15 of Exhibit A.

- 4. Plaintiffs responded to all of Defendants' proposed edits on March 5, 2021, and accepted most of the edits.
- 5. As of the filing of this declaration, Defendants have not provided Plaintiffs with any proposed revisions to the Production of Source Code section or proposed a separate agreement regarding source code.

Executed this 8th day of March, 2021, at Knoxville, Tennessee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ John L. Wood John L. Wood